

René Voss – Attorney at Law

15 Alderney Road
San Anselmo, CA 94960
Tel: 415-446-9027
renepvoss@gmail.com

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Rachel Smith (rsmith@fs.fed.us)
Forest Supervisor
Sequoia National Forest

cc: Nina Hemphill
Alison Sheehey
Ara Marderosian
Stephen Montgomery
Laura Cunningham

Subject: SFK, SC, and WWP Comments regarding the Dry Meadow Restoration Project
Draft EA

Sequoia ForestKeeper (SFK), the Kern-Kaweah Chapter of the Sierra Club (SC), and Western Watersheds Project (WWP) would like to provide the following comment regarding the Draft EA for the Dry Meadow Restoration Project (Dry Meadow). SFK and SC have participated in several meadow restoration project efforts including Big Meadows, Long Meadow, and Osa Meadow Restoration Projects, and provided detailed scoping comments on August 11, 2017, regarding the proposed Dry Meadow project.

SFK, SC, and WWP urge you to consider the following specific comments.

1. The Draft EA failed to properly state the issues and consider or develop an alternative that would restore the meadow that would fill the gullies without using the pond-and-plug method.

In our scoping comments we wrote:

We are encouraged that many of the projects that you are proposing in the Prioritized Ten Meadows scoping document are similar to the Halstead or Osa Meadow-type projects that restore sheet-flow to the meadows. The same should be considered and developed in the Dry Meadow Project as an alternative or even preferred approach to the pond and plug method put forth in the scoping notice. We believe this can be done by increasing the number and size of carefully-selected borrow areas to fill gullies and re-establish sheet flow throughout the meadow.

SFK/SC Scoping Comments at 2.

While the draft EA provides a summary of the second issue we raised with regard to the alternative pond-and-plug method, which we do not prefer, it has failed to list the issue with regard to Meadow Restoration Design that would allow consideration of an alternative that would fill the gullies and achieve the purpose and need of the project without resorting to the pond-and-plug method. In doing so, while this is an alternative that could be considered given the fact that the Forest and Park Service have implemented this method in other meadows, the Forest Service has failed to consider and analyze a viable alternative under NEPA. Nothing in the draft EA explains why this was not an issue, and nothing in the EA explains why this

alternative was not considered or analyzed. To comply with NEPA, the Forest Service must provide a rational explanation for why this is not a substantial issue. But given the fact that this method has been implemented in other locations in the Sequoia National Forest and National Park, the alternative must be considered and analyzed in this EA.

Even if the Forest Service ultimately determines that this alternative is not economically-desirable, that does not mean it isn't viable or feasible, and therefore this alternative must be considered and analyzed in detail because, in the long term, it is likely to restore the entire meadow to the end-goal stated in the purpose and need sooner than the pond-and-plug method.

2. Failure to properly state the range of issue that cows should be permanently kept out of the meadow.

As we stated in our scoping comments, we contend that continued grazing in the meadow is incompatible with either natural or man-made restoration of these meadows and will continue to have significant impacts on meadow resources. Therefore, we raised the issue that livestock grazing must be addressed as a part of the project analysis and design. We asked that the design must fence out cattle from the entire restoration area both during restoration and then permanently after restoration. And while the EA proposes to fence out cattle during restoration, it does not consider keeping them out permanently.

In the long run, continued livestock grazing will adversely affecting meadow resources. If cows are allowed back into the restoration areas, they will degrade willows and other riparian vegetation that is trying to reestablish, and cows will again trample vegetation near streams in the restored areas.

As we stated in our scoping comments, the impacts on riparian vegetation from cattle grazing are well-documented: “A fundamental issue with livestock grazing near streams is the impact of grazing on riparian vegetation (Kauffman and Krueger 1984), which has a central role in ecosystem functioning (Richardson et al. 2007).” See Attachment C, p. 2 (Nusslé et al. 2017 – *Patterns and dynamics of vegetation recovery following grazing cessation in the California golden trout habitat*). The Nusslé study also directly addresses grazing in meadows in the Sierras:

On several public lands within the Sierra Nevada Mountain Range in California, for example, streams and adjacent riparian vegetation in high-elevation meadows have been severely degraded by livestock grazing (Ratliff 1985, Knapp and Matthews 1996, Herbst et al. 2012, Purdy et al. 2012), reducing their potential to buffer increasing summer air temperatures. In a recent study, we found that reduced vegetation due to the combined effects of cattle activities can lead to river temperatures over 5°C higher in areas where cattle are present compared to ungrazed areas, where vegetation was both denser and larger due to cattle exclusion since 1991 (Nusslé et al. 2015).

Id., p. 2.

The Nusslé study “found that cattle exclusion is effective at favoring riparian vegetation growth, but that vegetation recovery from grazing could take several decades in these sensitive habitats

as some ‘rested’ areas have yet to recover to full vegetation height, even after 25 yr of rest.” *Id.*, p. 1.

Given the proximity of the Nusslé study’s location, just north of the project area in the Golden Trout Wilderness, the findings in the study are directly applicable and must be considered by the Sequoia National Forest. They counsel that cattle grazing along streams and meadows must cease for a long time (likely permanently) before meadows and riparian areas can properly recover, which should have been considered in the Dry Meadow Project design. Without considering and analyzing the permanent removal of grazing from Dry Meadow, the draft EA runs afoul of NEPA.

Please see the attached Appendix on Tufted hairgrass meadow reference sites and utilization, for a guide to proper functioning condition and restoration goals. Much of Dry Meadow was probably a tufted hairgrass wet meadow before intensive grazing and erosion dried portions out.

For Sequoia ForestKeeper, the Kern-Kaweah Chapter of the Sierra Club, and Western Watersheds Project,

Sincerely,

A handwritten signature in blue ink, appearing to read "René Voss". The signature is fluid and cursive, with a long horizontal stroke at the end.

René Voss – Attorney at Law